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TRAVIS MOREDA DAIRY and TRAVIS  
MOREDA

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

CALIFORNIANS FOR ALTERNATIVES TO  
TOXICS,

Plaintiff,

vs.

TRAVIS MOREDA DAIRY and TRAVIS  
MOREDA,

Defendants.

Case No. 3:24-CV-06632-SI

**STIPULATED REQUEST FOR ORDER  
CONTINUING INITIAL CASE  
MANAGEMENT CONFERENCE (L.R.  
6-1, 6-2); [PROPOSED] ORDER**

*[Filed concurrently with Declaration of  
Alexander Moore]*

*Assigned for all purposes to the  
Honorable Susan Illston*

**STIPULATION**

Pursuant to Local Rules 6-1 and 6-2, and supported by the accompanying Declaration of Alexander Moore, Plaintiff Californians for Alternatives to Toxics (“CAT”) and Defendants Travis Moreda and Travis Moreda Dairy (collectively “TMD,” and together with CAT, the “Parties”) through undersigned counsel hereby stipulate and respectfully request the Court continue the Initial Case Management Conference from October 17 to October 31, 2025, the hearing date set for TMD’s Motion to Dismiss, or in the alternative, for Summary Judgment. The Parties declare the following in support of this request:

WHEREAS, on November 22, 2024, the Court granted TMD’s Motion to Extend Time, extending TMD’s time to respond to CATs’ Complaint from November 25, 2024 to December 27, 2024, and extending all deadlines set by the Court’s Initial Case Management Scheduling Order and ADR Deadlines by 30 days (ECF No. 11);

WHEREAS, on January 2, 2025, the Court granted TMD’s Unopposed Motion for Extension of Time to File Answer, extending TMD’s time to file its Answer from December 27, 2024 to December 30, 2024 (ECF No. 15);

WHEREAS, on January 27, 2025, the Court granted the Parties’ Stipulated Request to Extend Deadlines Set by Court, extending the deadline for the Parties’ joint case management statement until April 11, 2025, and setting the Initial Case Management Conference for April 18, 2025 (ECF No. 19);

WHEREAS, on April 8, 2025, the Court granted the Parties’ Stipulated Request for Order Extending Initial Case Management Conference Dates to permit the Parties to attend an Early Settlement Conference before U.S. Magistrate Judge Peter H. Kang, extending the deadline for the Parties’ joint case management statement until July 11, 2025, and setting the Initial Case Management Conference for July 18, 2025 (ECF No. 23);

1 WHEREAS, on June 17, 2025, the Court resolved a discovery dispute by  
2 extending TMD's deadlines to respond to CAT's first set of written discovery  
3 requests from July 1, 2025 to August 1, 2025 and ordering that no depositions shall  
4 occur before August 1, 2025 (ECF No. 29);

5 WHEREAS, on July 1, 2025, the Court granted the Parties' Stipulated  
6 Request for Order Staying Case to permit further settlement discussions, extending  
7 the deadline for the Parties' joint case management statement until October 10, 2025,  
8 setting the Initial Case Management Conference for October 17, 2025, and extending  
9 TMD's deadlines to respond to CAT's first set of written discovery requests from  
10 August 1, 2025 to at least September 22, 2025, and ordering that no deposition  
11 notices shall be served prior to September 22, 2025 (ECF No. 33);

12 WHEREAS, on September 26, 2025, TMD filed a Motion to Dismiss or, in  
13 the Alternative, Motion for Summary Judgment (the "Motion"), which is set for  
14 hearing on October 31, 2025 (ECF No. 38);

15 WHEREAS, to promote judicial efficiency and conserve the expenditure of  
16 attorneys' fees and costs in litigation, the Parties jointly request a continuance of the  
17 Initial Case Management Conference from October 17 to October 31, 2025, and a  
18 corresponding continuance of the deadline for the joint case management statement  
19 from October 10 to October 24, 2025, so that the Initial Case Management  
20 Conference and Motion hearing occur on the same date;

21 WHEREFORE, the Parties hereby stipulate and respectfully request that the  
22 Court continue all case deadlines as follows:

- 23 (1) The deadline for the Parties to file their joint case management statement  
24 is extended from October 10, 2025 to October 24, 2025; and  
25 (2) The initial Case Management Conference is continued from October 17,  
26 2025 to October 31, 2025 at 2:30 p.m.

1  
2 Dated: October 3, 2025

Respectfully submitted,  
KING & SPALDING LLP

3  
4 By: /s/ Alexander Moore  
Alexander Moore

5 *Attorneys for Defendants*

6  
7 Dated: October 3, 2025

LAW OFFICE OF WILLIAM CARLON

8  
9 By: /s/ William N. Carlon  
William N. Carlon

Signature authority  
granted via email  
on October 3, 2025

10 *Attorneys for Plaintiff*

11  
12  
13 **PURSUANT TO STIPULATION, AND GOOD CAUSE SHOWN, IT IS SO**  
14 **ORDERED.**

15 Dated: \_\_\_\_\_

16 \_\_\_\_\_  
Honorable Susan Illston  
United States District Judge

**ATTESTATION**

Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that all signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: October 3, 2025

KING & SPALDING LLP

By: /s/ Alexander Moore  
Alexander Moore

*Attorneys for Defendants*